



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



June 5, 2015

Mr. Wade Ingram
Liberty Packing Co - The Morning Star Co
12045 S. Ingomar Grade Road
Los Banos, CA 93635-9796

Re: Notice of Minor Title V Permit Modification
District Facility # N-1399
Project # N-1152141

Dear Mr. Ingram:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct permits N-1399-26-0 and '-27-0 (under project N-1151381) into the Title V operating permit. The project was to install equipment for woodworking and wood stenciling operations.

Enclosed is the engineering evaluation with the following attachments: proposed Title V permit, recently issued Authority to Construct permits N-1399-26-0 and '-27-0, emission increases, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95358-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Title V APPLICATION REVIEW

Minor Modification

Facility Number: N-1399
Facility Name: Liberty Packing Co – The Morning Star Co

Mailing Address: 12045 S. Ingomar Grade Road
Los Banos, CA 93635-9796

Contact Name: Wade Ingram
Phone: (209) 829-5061

Responsible Official: Wade Ingram
Title: Steam Generating Colleague

Processing Staff: Jag Kahlon
Project Number: N-1152141
Date: June 5, 2015

I. PROPOSAL

Liberty Packing Company has proposed to incorporate Authority to Construct (ATC) permits N-1399-26-0 and '-27-0 into their Title V operating permit. These permits were issued without Certificate of Conformity (COC). The project was to install equipment for woodworking and wood stenciling operations.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for permit requirements.

II. FACILITY LOCATION

This facility is located at 12045 S. Ingomar Grade Road, Los Banos, California.

III. EQUIPMENT DESCRIPTION

N-1399-26-0

WOOD BIN/WOOD PALLET MANUFACTURING OPERATION INCLUDING ONE RIP/CROSS CUT SAW, ONE NOTCHER, ONE GANG DRILL SYSTEM, AND ONE CABINET SAW ALL SERVED BY A 9,000 CFM DONALDSON TORIT MODEL 81FT8 DUST COLLECTOR SYSTEM

N-1399-27-0

WOOD BIN/WOOD PALLET STENCILING OPERATION

IV. SCOPE OF EPA AND PUBLIC REVIEW

This project is a Minor Modification under Rule 2520 since the ATC project under which permits N-1399-26-0 and '-27-0 was issued was not an SB-288 or Federal Major Modification under Rule 2201. Therefore, public review is not required for this project.

V. APPLICABLE REQUIREMENTS

Rule 2520 Federally Mandated Operating Permits (6/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

N-1399-26

This is a new permit for woodworking operation.

The company has proposed to install one rip/cross cut saw, one notcher, one gang drill, and one cabinet saw. These machines will be vented a Donaldson Torit dust collector system. The proposed woodworking equipment will be used to make wood bins and pallets.

N-1399-27

This is a new permit for wood stenciling operation.

The company has proposed to conduct a stenciling operation to print their company logo on wood bins and or wood pallets using a roll coater filled with ink.

Note that the permit requirements referring State Implementation Plan (SIP) approved rules are now Federally Enforceable through Title V permit in each permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act;
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix III).

Compliance is expected with this Rule.

APPENDICES

- Appendix I: Proposed Title V Operating Permit No. N-1399-26-1 and '-27-1
Appendix II: Authority to Construct Permits N-1399-26-0 and '-27-0
Appendix III: Permit Application
Appendix IV: Emissions Change

Appendix I
Proposed Title V Operating Permit No. N-1399-26-1 and '-27-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1399-26-1

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

WOOD BIN/WOOD PALLET MANUFACTURING OPERATION INCLUDING ONE RIP/CROSS CUT SAW, ONE NOTCHER, ONE GANG DRILL SYSTEM, AND ONE CABINET SAW ALL SERVED BY A 9,000 CFM DONALDSON TORIT MODEL 81FT8 DUST COLLECTOR SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All filters shall be properly maintained and must be in place during the woodworking operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Replacement filters numbering at least 10% of the filters in the dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start-up inspection. The established range shall be listed in the Permit to Operate. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emissions at the dust collector discharge shall not exceed 0.0004 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
12. PM10 emissions from the equipment under this permit shall not exceed 183 pounds per year. The permittee shall maintain records sufficient to demonstrate compliance with this limit. These records shall contain calculated emission quantity as well as each process variable used in the respective calculations. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Differential operating pressure shall be monitored and recorded on each day woodworking equipment operates. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

DRAFT

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1399-27-1

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

WOOD BIN/WOOD PALLET STENCILING OPERATION

PERMIT UNIT REQUIREMENTS

1. Ink shall be applied using a roll coater. [District Rule 2201] Federally Enforceable Through Title V Permit
2. VOC emissions from this operation shall not exceed 2.0 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC emissions shall be calculated as follows: $[\text{Total ink dispensed (gallons)} \times \text{VOC content (lb-VOC/gal)}] / [\text{Number of days ink applied}]$. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The owner or operator shall keep records of the date, amount of ink dispensed in the roll coater (gallons), VOC content in the ink (lb-VOC/gal), number of days ink applied. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The owner or operator shall keep on-site the latest Safety Data Sheet showing VOC content in the ink. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix II
Authority to Construct Permits N-1399-26-0 and '-27-0



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1399-26-0

ISSUANCE DATE: 05/04/2015

LEGAL OWNER OR OPERATOR: LIBERTY PACKING CO - THE MORNING STAR CO
MAILING ADDRESS: 12045 S INGOMAR GRADE RD
LOS BANOS, CA 93635

LOCATION: 12045 S INGOMAR GRADE RD
LOS BANOS, CA 93635

EQUIPMENT DESCRIPTION:

WOOD BIN/WOOD PALLET MANUFACTURING OPERATION INCLUDING ONE RIP/CROSS CUT SAW, ONE NOTCHER, ONE GANG DRILL SYSTEM, AND ONE CABINET SAW ALL SERVED BY A 9,000 CFM DONALDSON TORIT MODEL 81FT8 DUST COLLECTOR SYSTEM

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
6. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201]
7. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201]
8. All filters shall be properly maintained and must be in place during the woodworking operation. [District Rule 2201]
9. Dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin / Executive Director / APCO


Arnaud Marjollet, Director of Permit Services
N-1399-26-0: May 4 2015 8:03AM - KAH/LONJ Joint Inspection NOT Required

10. Replacement filters numbering at least 10% of the filters in the dust collector shall be maintained on the premises. [District Rule 2201]
11. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
12. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start-up inspection. The established range shall be listed in the Permit to Operate. [District Rule 2201]
13. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
14. PM10 emissions at the dust collector discharge shall not exceed 0.0004 gr/dscf. [District Rule 2201]
15. PM10 emissions from the equipment under this permit shall not exceed 183 pounds per year. The permittee shall maintain records sufficient to demonstrate compliance with this limit. These records shall contain calculated emission quantity as well as each process variable used in the respective calculations. [District Rule 2201]
16. Differential operating pressure shall be monitored and recorded on each day woodworking equipment operates. [District Rule 2201]
17. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201]
18. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201]
19. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1399-27-0

ISSUANCE DATE: 05/04/2015

LEGAL OWNER OR OPERATOR: LIBERTY PACKING CO - THE MORNING STAR CO
MAILING ADDRESS: 12045 S INGOMAR GRADE RD
LOS BANOS, CA 93635

LOCATION: 12045 S INGOMAR GRADE RD
LOS BANOS, CA 93635

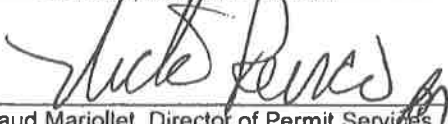
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3. Ink shall be applied using a roll coater. [District Rule 2201]
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5. VOC emissions shall be calculated as follows: [Total ink dispensed (gallons) x VOC content (lb-VOC/gal)]/[Number of days ink applied]. [District Rule 2201]
6. The owner or operator shall keep records of the date, amount of ink dispensed in the roll coater (gallons), VOC content in the ink (lb-VOC/gal), number of days ink applied. [District Rule 2201]
7. The owner or operator shall keep on-site the latest Safety Data Sheet showing VOC content in the ink. [District Rule 2201]
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services

N-1399-27-0; May 4 2015 8:03AM - KAHLOJ - Joint Inspection NOT Required

Appendix III
Permit Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: LIBERTY PACKING CO. - THE MORNING STAR CO.	
2. MAILING ADDRESS: STREET/P.O. BOX: 12045 S. INGOMAR GRADE RD. CITY: LOS BANOS STATE: CA 9-DIGIT ZIP CODE: 93635-9796	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 12045 S. INGOMAR GRADE RD. CITY: LOS BANOS 1/4 SECTION TOWNSHIP RANGE	INSTALLATION DATE: JUNE 2015
4. GENERAL NATURE OF BUSINESS: AGRICULTURAL PRODUCTS PROCESSING	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) APPLICATION TO INCORPORATE ATC PERMITS N-1399-26-0 AND N-1399-27-0 INTO FACILITY TITLE V PERMIT AS REQUIRED PER CONDITION NO. 1 ON ATC PERMITS.	
6. TYPE OR PRINT NAME OF APPLICANT: WADE INGRAM	TITLE OF APPLICANT: STEAM GENERATING COLLEAGUE
7. SIGNATURE OF APPLICANT: 	DATE: 6/2/2015 PHONE: (209) 829-5061 FAX: (209) 826-0100 EMAIL: wingram@morningstarco.com

For APCD Use Only:

DATE STAMP: RECEIVED JUN 03 2015 SJVAPCD	FILING FEE RECEIVED: \$ 0 CHECK#: _____ DATE PAID: _____ PROJECT NO: N1152141 FACILITY ID: N-1399
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NORTHERN REGION

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- ☐ SIGNIFICANT PERMIT MODIFICATION ☐ ADMINISTRATIVE
☒ MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Liberty Packing Co. – The Morning Star Co.	FACILITY ID: N – 1399
1. Type of Organization: <input type="checkbox"/> Corporation <input checked="" type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Chris Rufer	
3. Agent to the Owner: Wade Ingram	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:

Wade Ingram
Signature of Responsible Official

6/2/2015
Date

Wade Ingram
Name of Responsible Official (please print)

Steam Generating Colleague
Title of Responsible Official (please print)

Appendix IV Emissions Change

Emissions Change

Per application review under project N-1151381, quarterly emissions change is as follows:

N-1399-26-0:

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
PM ₁₀	45.75	0	45.75

N-1399-27-0:

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
VOC	182.5	0	182.5